

**UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT**

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**NATIONAL LABOR RELATIONS BOARD,
Petitioner,**

v.

Case No. 19-3451

**ALARIS HEALTH AT THE ATRIUM,
Respondent.**

**MOTION TO
INTERVENE**

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1199 SEIU United Healthcare Workers East moves this Court, pursuant to Rule 15 of the Federal Rules of Appellate Procedure, for leave to intervene in this proceeding in which Petitioner National Labor Relations Board seeks summary enforcement of its Order issued against Respondent Alaris Health at The Atrium, in Case No. 22-CA-206044, reported at 368 NLRB No. 82.

Dated: November 19, 2019

Respectfully submitted,

/s/ Katherine H. Hansen
Katherine H. Hansen

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Attorneys for 1199 SEIU United
Healthcare Workers East

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**DECLARATION OF KATHERINE H. HANSEN IN SUPPORT
OF MOTION FOR LEAVE TO INTERVENE**

I, Katherine H. Hansen, an attorney duly admitted to practice before the United States Court of Appeals for the Third Circuit under penalty of perjury, declare that the following statements are true and correct:

1. I am a partner at the firm of Gladstein, Reif & Meginniss, LLP, counsel to 1199 SEIU United Healthcare Workers East (“1199 SEIU” or “the Union”). I was admitted to practice before the United States Court of Appeals for the Third Circuit in 2014 and am a member in good standing.

2. I submit this declaration in support of 1199 SEIU’s motion for leave to intervene in this proceeding in which Petitioner National Labor Relations Board (“Petitioner”) seeks summary enforcement of its Order issued against Respondent Alaris Health at The Atrium (“Respondent”), in Case No. 22-CA-206044, reported at 368 NLRB No. 82.

3. 1199 SEIU, a labor organization, was the charging party in the underlying NLRB proceedings. The NLRB's Decision and Order directly affects the Union, as Respondent's unlawful actions impact the rights of the Union's members.

4. I am fully familiar with the facts and issues presented in this matter, as my firm represented the Union in the underlying unfair labor practice proceedings.

5. The Union moves to intervene in support of Petitioner's enforcement action.

Dated: November 19, 2019

/s/ Katherine H. Hansen
Katherine H. Hansen

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**RULE 26.1
DISCLOSURE
STATEMENT**

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1199 SEIU United Healthcare Workers East, (“1199 SEIU”) has filed the accompanying motion for leave to intervene and submits this disclosure statement pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure.

1199 SEIU is not a corporation. 1199 SEIU is affiliated with the Service Employees International Union. 1199 SEIU is a labor organization.

Dated: November 19, 2019

/s/ Katherine H. Hansen
Katherine H. Hansen

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CERTIFICATE OF SERVICE

I, Katherine H. Hansen, hereby certify that a true copy of each of 1199 SEIU United Healthcare Workers East's Motion for Leave to Intervene, Declaration of Katherine H. Hansen in Support of Motion for Leave to Intervene, and Rule 26.1 Disclosure Statement, have this day been duly served on all attorneys of record via electronic filing with the Court's CM/ECF system:

Dated: November 19, 2019

/s/ Katherine H. Hansen
Katherine H. Hansen

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